

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES of AMERICA,

v.

Case 1:20-cr-10307 DJC

GUSTAVO KINRYS,
Defendant.

MOTION FOR RETURN OF PROPERTY

Defendant, Gustavo Kinrys, by his counsel, Kevin L. Barron, Esq., respectfully moves the Honorable Court for return of his passport. Probation is in possession of the passport and informs counsel that an order of court is necessary for its release. Defendant requests that the Court's order allow defendant's wife, Irena Cafassao, to receive the passport.

Dated: March 1, 2024

Respectfully Submitted,
Gustavo Kinrys, defendant,
By his counsel,
/s/Kevin L. Barron
Kevin L. Barron, Esq.
P.O. Box 290533
Charlestown, MA 02129
(617) 407-6837

CERTIFICATE OF SERVICE

Counsel certifies that he has caused a true copy of this motion to be served today on counsel for all the parties through the CM/ECF system of this District as set forth in the Notice of Electronic Filing and that no party requires service by other means.

/s/Kevin L. Barron